



0066143

Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

05-ESD-0085

AUG 1 2005

Mr. R. G. Gallagher, President
and Chief Executive Officer
Fluor Hanford, Inc.
Richland, Washington 99352

RECEIVED
AUG 18 2005

EDMC

Dear Mr. Gallagher:

CONTRACT NO. DE-AC06-96RL13200 – TRANSMITTAL OF ASSESSMENT OF STATE
WASTE DISCHARGE PERMIT ST-4502, 200 AREA TREATED EFFLUENT DISPOSAL
FACILITY (TEDF)

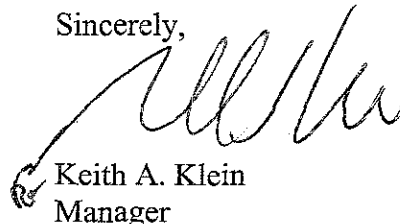
Enclosed please find RL "Assessment of State Waste Discharge Permit ST-4502, 200 Area TEDF." Compliance with environmental permits is a requirement of the Project Hanford Management Contract. To assess this compliance, RL performed an assessment of FHI management and implementation of State of Washington, Department of Ecology issued State Waste Discharge Permit ST-4502 for the 200 Area TEDF.

Overall, the assessment concluded that the documentation does demonstrate regulatory compliance with Permit conditions and requirements. However, the assessment also resulted in one finding and one issue, along with a good practice. R. L. Szelmechka, FHI, and D. L. Flyckt, Duratek Federal Services of Hanford, reviewed and commented for factual accuracy on the draft document prior to finalization. RL appreciates your staff's helpful and courteous manner, which was apparent during the assessment process.

Please provide a response to the assessment finding within 45 days of receipt of this letter. The Government considers this action to be within the scope of the existing contract and therefore, the action does not involve or authorize any delay in delivery or additional cost to the Government, either direct or indirect.

If you have questions, please contact me, or your staff may contact Doug S. Shoop, Assistant Manager for Safety and Engineering, on (509) 376-0108.

Sincerely,



Keith A. Klein
Manager

ESD:MFJ

Enclosure

cc: See page 2

Mr. R. G. Gallagher
05-ESD-0085

-2-

cc w/encl:

D. M. Busche, FHI

D. L. Flyckt, FHI

L. L. Fritz, FHI

J. E. Hyatt, FHI

M. W. Martin, FHI

D.E. McKenney, FHI

D. K. Smith, FHI

R. W. Szelmezcza, FHI

J. F. Williams, FHI

Administrative Record (files: State Waste Discharge Permit ST-4502; TEDF)

cc: w/o encl:

Environmental Portal

**DEPARTMENT OF ENERGY
RICHLAND OPERATIONS OFFICE
ASSESSMENT OF STATE WASTE DISCHARGE PERMIT
ST-4502
200 AREA TEDF
A-05-ESD-FHI-TEDF-002**



May 23, 2005

Performed by:

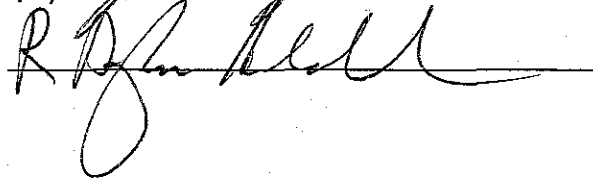
Mary F. Jarvis, Assessment Lead
Environmental Services Division
and
R. Douglas Hildebrand, Team Member
Office of Assistant Manager for the Central Plateau

**DEPARTMENT OF ENERGY
RICHLAND OPERATIONS OFFICE
ASSESSMENT OF STATE WASTE DISCHARGE PERMIT
ST-4502 200 AREA TEDF**

Team Lead



Team Member



EXECUTIVE SUMMARY

Compliance with environmental permits is a requirement of the Project Hanford Management Contract. To assess this compliance, the Department of Energy, Richland Operations Office (RL) performed an assessment of Fluor Hanford, Inc. (FHI) management and implementation of State of Washington Department of Ecology (Ecology)-issued State Waste Discharge Permit ST-4502 (Permit) for the 200 Area Treated Effluent Disposal Facility (TEDF). On March 30, 2005, the assessment team reviewed samples from five years of compliance records and all Permit-required deliverables to judge if the contractor was able to demonstrate compliance with the conditions and limitations of ST-4502. Overall, the assessment concludes that the documentation does demonstrate regulatory compliance with the permit conditions and requirements. The assessment identified one finding and one issue. In addition, there was a good practice and strength observed. These are described in 3.0, Assessment Results.

1.0 Scope of Assessment

The Project Hanford Management Contract No. DE-AC06-96RL13200, Part I-The Schedule, Section C, Statement of Work, C.5.1 Environment, Safety, Health and Quality Assurance, Subsection C. 5.1.1 Environmental Protection, "Requirements," states that "the Contractor shall manage assigned facilities and operable units to assure compliance with environmental permits, requirements, and agreements." To verify this compliance, the assessment examined a sample of documents submitted to Ecology and DOE, as well as documents maintained to demonstrate compliance with the requirements of the State Waste Discharge Permit ST-4502. The assessment was performed at the 200 Area Treated Effluent Disposal Facility (TEDF) at the Hanford Site on March 30, 2005.

ST-4502 expires May 18, 2005. An application for renewal has been submitted and Ecology issued a letter extending the permit until a new permit is issued. A minimum of one regulatory inspection is performed during the five-year life of the permit; consequently, such an inspection can be expected at anytime. The last Ecology inspection was performed February 16, 2000. As a result, RL decided it was prudent to perform an assessment to ascertain the facility's compliance with the Permit's conditions and limitations in advance of the forthcoming regulatory inspection. Subsequently, on April 26, 2005, Ecology scheduled an inspection of ST-4502 for May 11, 2005.

2.0 Summary of Results

This section summarizes the assessment by describing the activities the assessor performed. The following activities are required by ST-4502 and the assessors examined documentation that demonstrated compliance with these requirements:

1. Review four selected Discharge Monitoring Reports and compare to Permit requirements. Discharge Monitoring Reports are required to be submitted quarterly to Ecology by a condition in the Permit. For this assessment, the following Discharge Monitoring Reports (DMRs) were chosen:

- **1st Quarter 2001.** Letter to H.E. Bilson (DOE) from E.S. Aromi (FHI), *Quarterly Discharge Monitoring Report for the 200 Area Effluent Treatment and Treated Effluent Disposal Facilities Covering the January 2001 through March 2001 Reporting Period.* FH-0102390. May 1, 2001.
- **2nd Quarter 2002.** Letter to K.A. Conaway (Ecology) from D.L. Flyckt (FHI), *Quarterly Discharge Monitoring Report for the 200 Area Effluent Treatment and Treated Effluent Disposal Facilities Covering the April 2002 through June 2002 Reporting Period.* FH-0304129. August 13, 2002.
- **3rd Quarter 2003.** Letter to K.A. Conaway (Ecology) from D.L. Flyckt (FHI), *Quarterly Discharge Monitoring Report for the 200 Area Effluent Treatment and Treated Effluent Disposal Facilities Covering the July 2003 through September 2003 Reporting Period.* FH-0304129. October 29, 2003.
- **4th Quarter 2004.** Letter to K.A. Conaway (Ecology) from D.L. Flyckt (FHI), *Quarterly Discharge Monitoring Report for the 200 Area Effluent Treatment and Treated Effluent Disposal Facilities Covering the October 2004 through December 2004 Reporting Period.* FH-0304129. February 8, 2005.

Result: The Discharge Monitoring Reports (DMRs) were reviewed to determine if the parameters required to be sampled and analyzed per the Permit were indeed tested. The DMRs were also checked to see if the analytical results were within the effluent and groundwater limits specified by the Permit, to verify if the practical quantitation limit had been adhered to, and to see if the analytical methods required by the Permit were employed. When compared to the requirements of the Permit, the DMRs were all judged to be correct and met program requirements.

2. Have there been any Noncompliance Notifications or Reports made on ST-4502 this permit cycle? Please provide copies. (Source Document: ST-4502)

Result: Yes, there was a single Noncompliance Notification filed January 26, 2001, based on a May 23, 2001, unauthorized spill from WESF. A copy was provided.

3. Please provide copies of the annual notification of the Operation and Maintenance Manual Matrix Review and Updates to demonstrate compliance with permit condition S5. A. Operation and Maintenance Manual The *O&M Manual Matrix shall be reviewed by the Permittee at least annually. The Permittee shall confirm the review by letter and/or a matrix update to Ecology.* (Source Document: ST-4502.)

Result: The contractor provided written notification to Ecology that the O&M Matrix had been reviewed and was available for inspection as a requirement of the Permit. The annual notifications were provided in the transmittal letters to the DMRs for Calendar Years 2001, 2002, and 2003. The contractor could produce all the required documents. The notice for 2004 is currently in concurrence for transmittal. The annual notifications are contained in the following letters:

- 2001---Letter to K.A. Conaway (Ecology) from J. Hebdon (DOE), *Quarterly Discharge Monitoring Report for the 200 Area Effluent Treatment and Treated Effluent Disposal Facilities Covering the January 2001 through March 2001 Reporting Period*. 01-RCA-280. May 14, 2001.
- 2002---Letter to K.A. Conaway (Ecology) from D.L. Flyckt (FHI), *Quarterly Discharge Monitoring Report for the 200 Area Effluent Treatment and Treated Effluent Disposal Facilities Covering the July 2002 through September 2002 Reporting Period*. FH-0205069. October 20, 2002.
- 2003---Letter to K.A. Conaway (Ecology) from D.L. Flyckt (FHI), *Quarterly Discharge Monitoring Report for the 200 Area Effluent Treatment and Treated Effluent Disposal Facilities Covering the July 2003 through September 2003 Reporting Period*. FH-0304129. October 29, 2003.

4. Have there been any Overflow Sample Analysis Reports in this permit cycle?
(Source Document: ST-4502)

Result: No, there have been no Overflow Sample Analysis Reports in this permit cycle, i.e., since the permit became effective May 18, 2000.

5. Have open items from the previous inspection been closed?
(Source Document: WAC Code)

Result: Yes, no open items remain from the Ecology inspection performed February 16, 2000.

3.0 Assessment Results

This section describes any finding, issues, observations, and good practices identified during the assessments. There was one finding, one issue, and one good practice identified.

Finding

Tracking Number A-05-ESD-FHI-TEDF-002-F01

A finding is a noncompliance with requirements. Requirements basis can range from laws to contractor facility level procedures.

The finding is that the October 2003 Third Quarter DMR Groundwater Data is missing from the Hanford Environmental Information System (HEIS). HEIS is the electronic database repository for retaining Hanford's Groundwater data per the Hanford Federal Facility Agreement and Consent Order or Tri-Party Agreement. DOE has chosen HEIS as the database to retain all of its environmental data. To comply with DOE/96-98 *Hanford Analytical Services Quality Assurance Requirements Document* (HASQARD) Appendix A, Rev. 2, Volume 2, Sampling Technical Requirements Effective Date: 09/30/98 -- 9. DATA MANAGEMENT - All records generated in steps 1-8 shall be maintained in accordance with approved Records Inventory and Disposal Schedule. All environmental analytical data shall be submitted to the Hanford Environmental Information System (HEIS). The groundwater data needs to be entered into HEIS for regulator viewing. Measures should be taken so that this mistake is not repeated.

RL Lead Assessor Closure Required: YES ☒ NO ☐

Issue

Tracking Number A-05-ESD-FHI-TEDF-002-I 01

An issue is a concern, finding, observation, judgment of needs, opportunity for improvement, etc.

The RL assessors choose an analysis on a DMR and asked for the documentation that showed that the analytical method required by the Permit was actually used to analyze that particular analyte. Finally, the facility personnel did provide the appropriate documentation in the form of several computer printouts of laboratory sheets. However, the process employed to demonstrate compliance was not crisp or straightforward. This question will likely arise again during the upcoming Ecology inspection and the answer should be clear and concise.

RL Lead Assessor Closure Required: YES ☐ NO ☒

Good Practices or Strengths

The Contractors received one-day notice about this assessment but, nonetheless, were very prepared with the necessary documentation. They were very courteous, patient, and helpful in answering questions and supplying additional reports and letters. The Contractors are very knowledgeable about the facilities and the contents of the Permits and other pertinent regulatory documents. The Contractor's files appeared to be in good order because they were able to retrieve records either during the on-site assessment or that same day.

RL Lead Assessor Closure Required: YES ☐ NO ☒

4.0 Conclusions

Based on the assessment, it is the opinion of these assessors that Fluor Hanford, Inc. is doing a good job of implementing requirements and adhering to the conditions and limitation of ST-4502. The area which needs improvement is in assuring that groundwater data is entered into HEIS and in communicating from the documentation how the analytical methods required by the Permit are actually the methods used to analyze a given parameter.